

**COMMONWEALTH OF MASSACHUSETTS**  
**Department of Telecommunications and Energy**

RESPONSE OF THE ATTORNEY GENERAL TO THE  
SECOND SET OF INFORMATION REQUESTS FROM THE  
BAY STATE GAS COMPANY  
DTE 05-27

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-22            Refer to the Cavallo Testimony at 6-7. Are Mr. Cavallo's "field observations" based on the two excavations he witnessed?

Response:            In addition to the two excavations, Mr. Cavallo had the opportunity to interview a 20 year Bay State Gas Company employee, Mr. Timothy Leary, who fixes pipe leaks and renews services and has witnessed numerous excavations of the Company's distribution system. Mr. Leary conveyed a number of field observations regarding Company practices, including the following examples:

- In recent years, the standing direction to the crews was to fix leaks using clamps, but not to consider replacing the affected section of the pipe. The crew foreman may put a note in his work order to the effect that a given section of pipe is degraded enough that it should be replaced, but that the subsequent replacement of the pipe was in no way guaranteed.
- The Company's focus on claiming that bare steel piping is an emergency situation is not correct. In Mr. Leary's experience, the older, coated / unprotected pipe is far more likely to have corrosion problems.
- Mr. Leary expressed a concern about the corrosion resistance of the coated copper locator wire that he and his counterparts were currently installing in conjunction with plastic replacement pipe.

A copy of the interview notes are attached as a supplement to this response.